

Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	ET Docket No. 02-98
)	
Amendment of Parts 2 and 97 of the)	RM-9404
Commission's Rules to Create a Low)	
Frequency allocation for the Amateur Radio)	
Service)	
_____)	

The following comments are those of Roger V. Thompson, an Extra Class amateur radio operator (AD5T), licensed Professional Engineer and retired wireless research manager having over 30 years experience in radio as a profession and a hobby. I have been an experimenter in the 160-190 kHz band for over a decade.

I support the secondary allocation of 135.7-137.8 kHz to the amateur radio service. While I expect use of this band to first center on technical and propagation experimentation, it is possible other uses, including public service and emergency communications will follow due to the unique characteristics of these frequencies.

The proposed limits on both transmitter output power and radiated power, however, will unnecessarily constrain experimentation and other uses by those who have limited space or financial resources, for example young people, school groups, or urban residents. A radiated power limit is the only necessary control that should be applied, otherwise those with antenna systems of limited efficiency will be forever unable to compensate with increased transmitter power. Amateur radio operators who can calculate or measure radiated power should not be also restrained by a transmitter power PEP limit. Perhaps meeting either a set PEP limit or a radiated power limit would be a good compromise.

As to the potential for interference to unlicensed PLC operations, only about 2% of the spectrum available for PLC operation is impacted by this proposal. Surely this suggests that existing operations can be moved without undue difficulty. If the PLC systems are vulnerable to interference from the benign types of operations likely to be conducted by amateur radio operators, perhaps it is in the public interest to require more modern or robust control systems be implemented by the power industry.

Thank you for the proposal and the opportunity to comment.

Dated this 29th day of July, 2002

(signed)

Roger V. Thompson, P.E.